

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOBAR HOLDING CORPORATION, ROBERT BUCK,
Individually, and ROBERT BUCK, as Executor of the
Estate of JOAN BUCK, and ROBERT BUCK, individually
and ROBERT BUCK, As Executor of the Estate of JOAN
BUCK, derivatively as shareholders on behalf of JOBAR
HOLDING CORPORATION,

Case No.:
1:23-cv-11217 (JGLC) (GS)

NOTICE OF MOTION

Plaintiffs,

-against-

DAVID HALIO,

Defendant.
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PLEASE TAKE NOTICE, that upon the accompanying Declaration of Emanuel Kataev, Esq. and the Memorandum of Law submitted herewith, Defendant Dr. Halio will move this Court before the Hon. Jessica G. L. Clarke, U.S.D.J., at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 20C, New York, NY 10007-1312, for an Order directing Plaintiffs and their counsel Scarini & Hollenbeck, LLC and Daniel S. Brecher, Esq. to pay monetary sanctions and attorneys' fees pursuant to (i) Rules 11(b)(1), (2) & (3), 11(c); (ii) 28 U.S.C. § 1927; and (iii) and the Court's inherent power, and for such other remedies as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that – pursuant to the Local Civil Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York – opposition papers must be served within fourteen (14) days of filing of the moving papers, and reply papers must be served within seven (7) days of service and filing of the opposition papers.

Dated: Jamaica, New York
April 12, 2024

Respectfully submitted,

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.

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